IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA MACON DIVISION

)	
ENSOCARE INC.,)	
)	
Plaintiff)	
)	
v.)	Case No. 5:20-cv-00306-MTT
)	
ENSOCARE: HOLISTIC MENTAL)	
HEALTH SERVICES, LLC,)	
)	
Defendant)	
	_)	

<u>DEFENDANT'S UNOPPOSED MOTION</u> <u>FOR AN EXTENSION OF TIME</u> <u>TO FILE RESPONSIVE PLEADING UNDER FED. R. CIV. P. 12</u>

Pursuant to Fed. R. Civ. P. 6(b) and 12(a), Defendant Ensocare: Holistic Mental Health Services, LLC respectfully moves this Court for an eleven (11) day extension of time to file a responsive pleading and in support states as follows:

- 1. Defendant was served with a Summons and Complaint from this Court on August 6, 2020.
- 2. But for the extension of time requested herein, Defendant's responsive pleading is due on August 27, 2020.
- 3. Defendant obtained counsel on August 26, 2020.

4. This Motion is Defendant's first and only request for an extension of time to

file a pleading responsive to Plaintiff's Complaint.

5. By this Motion, Defendant seeks a reasonable extension of time in the amount

of eleven (11) days necessary for Defendant to review and respond to

Plaintiff's Complaint, extending the deadline to file the same to on or before

Monday, September 7, 2020.

6. The parties have met, conferred and agreed that an eleven day extension of

time for Defendant to respond to the Complaint is appropriate.

7. This Motion is unopposed.

8. This Motion is not made for the purpose of harassment or prolonging

litigation.

THEREFORE, Defendant respectfully moves this Court for an order

extending the time to file an answer or other responsive pleading by eleven (11)

days, making such answer or other responsive pleading due on or before September

7, 2020.

Dated: August 27, 2020

Respectfully submitted,

Steven Stewart LLC

By: /s/ Steven Stewart
Steven Stewart

Georgia Bar No. 719301

Attorney for Defendant

Ensocare: Holistic Mental

Health Services, LLC

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 27th day of August, 2020, the foregoing document was electronically filed using the CM/ECF system, which will send notification of such filing to all counsel and parties of record.

Dated: August 27, 2020

/s/ Steven Stewart
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